

**TASK ORDER SUBMITTAL  
R-10 AES (SMALL BUSINESS)  
CONTRACT NO. 68-S7-03-04 TASK ORDER 003B**

**MEMORANDUM**

Date: **February 2, 2007**  
To: **Sean Sheldrake, Task Order Project Officer**  
From: **Will Park, Senior Project Manager**  
Subject: **UPDATED DEFINITIONS ARKEMA EE/CA WORK PLAN  
FOR INTERNAL REVIEW**  
cc: **EPA File  
Peter Battuello, Parametrix  
Charlie Wisdom, Parametrix**  
  
Project Number: **415-2328-007 (003B)**  
Project Name: **Arkema**

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The following are preliminary definitions we discussed at the Principal Threat Delineation Meeting on December 7, 2006. The preliminary definitions will be refined through review and further screening.

**PROPOSED REMOVAL ACTION AREA (RAA) DELINEATION CRITERIA**

The removal action area will be defined at the end of the EE/CA using the following criteria:

- A boundary will be drawn to surround the 50'x50' square grid cells as shown on the attached figure where at least one sediment constituent exceeding the Principal Threat Material (PTM) definition.
- All grid cells contained within this boundary line will be included in the RAA.
- Vertically, the boundary will extend to 5' below the deepest PTM exceedance within each grid cell or to bedrock, whichever comes first. The depth of the RAA may be modified by engineering limitations or the need to address future flux from residual groundwater contamination.
- An uncertainty fringe of two 50'x50' grid cells outside of boundary line will be added to capture as much contamination as possible from resuspension during the removal actions.
- The RAA will extend upland as far as the upland edge of a hydraulic containment structure.
- The hydraulic containment structure will be sited in an optimum location to maximize removal of in-water PTM and priority risks and minimize recontamination potential.
  - Structural needs will need to be defined, including minimizing the residual groundwater wedge.

Additional criteria may be added based on the findings of the Site Characterization and Technology Assessment.

**PROPOSED PRINCIPAL THREAT MATERIAL**

That solid material that exceeds PEC values and any solid material that exceeds 1000X any specific sediment SLV used to identify Chemicals of Interest (see SLVs in Tables C-2a,b,c,d in Appendix C).